

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

DAVID E. MACK,

Plaintiff,

v.

PALISADES COLLECTION, LLC, *et al.*

Defendant.

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Civil Action No. 4: 11-cv-00343

AGREED MOTION TO VACATE JUDGMENT AGAINST MICHAEL J. SCOTT

1. Plaintiff, David E. Mack and Defendant Michael J. Scott, ask the court to vacate the judgment rendered by the Court, and would show unto the Court as follows:.

Procedural History

2. Plaintiff has sued the defendant for certain violations under state and federal law in the above-entitled and numbered case ("Case").

3. All parties have appeared herein.

4. The Case was filed on June 10, 2011. The Court entered a default judgment against Defendant Michael J. Scott on October 13, 2011 (hereinafter, the "Judgment").

5. Plaintiff and Defendant Michael J. Scott hereby request that the referenced Judgment against Defendant Michael J. Scott be vacated and set aside.

6. Plaintiff and Defendant Michael J. Scott attach hereto a proposed Order for entry by the Court.

Prayer

WHEREFORE, PREMISES CONSIDERED, Plaintiff and Defendant Michael J. Scott respectfully asks the Court to vacate and/or set aside the Default Judgment against Defendant Michael J. Scott and enter attached Order Vacating Default Judgment Against Michael J. Scott.

Respectfully submitted,

MICHAEL J SCOTT, PC

/s/ Michael J. Scott

Michael J. Scott TXBN 24000876
Teri Stewart Mace TXBN 12759480
1120 Metrocrest Drive, Suite 100
Carrollton, Texas 75006
Telephone: (214) 234-8456
Facsimile: (214) 234-8454

**ATTORNEYS FOR DEFENDANTS,
MICHAEL J. SCOTT**

/s/ David E. Mack

David E. Mack (*pro se*)
7720 McCallum Blvd., #2099
Dallas, Texas 75252
Telephone: 972.735.9642

Agreed:

/s/ Jessica Davis f/k/a Jessica Eckstein

Jessica Eckstein